

Department of Energy

Idaho Operations Office 1955 Fremont Avenue Idaho Falls, ID 83401

February 15, 2005

David Kipping, Chairman INEEL Citizens Advisory Board c/o North Wind, Inc. 1425 Higham Street Idaho Falls, Idaho 83402

SUBJECT: INEEL Citizens Advisory Board (CAB) Recommendation #120 on the Engineering Evaluation/Cost Analysis for Phase 1 of the Decommissioning for the Power Burst Facility (PBF) Reactor Building (EM-FMDP-05-007)

Dear Mr. Kipping:

Thank you for reviewing and providing comments on the Engineering Evaluation/Cost Analysis prepared for the proposed CERCLA removal action for Phase 1 Decommissioning of the Power Burst Facility Reactor Building. After considering the comments provided by the Citizens Advisory Board and other interested groups, DOE is proceeding with a phased approach for the Power Burst Facility Reactor. The Action Memo that describes phase 1 is provided with this letter. Responses to the Board's comments are included in the Action Memo and are summarized below:

- The CAB supported Alternative 2. The phased decommissioning approach described in Alternative 2 was selected.
- The CAB preferred disposal of radioactive water in an evaporation tank. The Action Memo specifies that radioactive water will be consolidated in the PER-706 evaporation tank. If water is still in the tank when it is decommissioned, it will be transferred to the lined INEEL CERCLA Disposal Facility (ICDF) evaporation pond.
- The CAB preferred off-site disposal of lead and cadmium. The Action Memo specifies that non-recycled lead and cadmium will be disposed at Envirocare.
- The CAB preferred off-site disposal of the inpile tube. The Action Memo specifies that the inpile tube will be disposed in the ICDF. As required by the ICDF procedures, a performance assessment was completed and reviewed by the Idaho Department of Environmental Quality and EPA. The agencies concluded that disposal of the inpile tube in ICDF would not pose an adverse impact to the aquifer.
- The CAB recommended against disposal of highly radioactive waste over the Snake River Plain Aquifer. Waste that is inconsistent with the risk basis or that does not meet the Waste Acceptance Criteria for the ICDF will not be disposed in the ICDF. The Waste Acceptance Criteria may be modified with agreement of Idaho Department of Environmental Quality and EPA, but the risk basis has not and will not be changed.

- The CAB recommended that appropriate disposition of each waste stream be evaluated prior to initiation of decommissioning. DOE agrees with this recommendation. The Action Memo specifies the disposition of all expected waste streams.
- The CAB recommended that any material used to fill the reactor vessel be easily removable. The Action Memo specifies that the reactor vessel will be covered with a steel plate but will not need to be filled.

Phase 1 of the Power Burst Facility Reactor decommissioning is currently scheduled to be completed in April 2005. If you have questions, please contact me at 208-526-7300 or William Harker at 208-526-3224.

Sincerely

Richard B. Provencher, Assistant Manager

Idaho Cleanup Project

Attachment